

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	<b>CASE No.:</b>
	)	<b>4:21-cr-00073-RSB-CLR-2</b>
	)	
<b>v.</b>	)	
<b>ROBERT STEPHENS</b>	)	
<i>Defendant</i>	)	
<hr style="border-top: 1px solid black;"/>	)	

**SENTENCING MEMORANDUM**

Robert Stephens is before this Court for sentencing.

United States Probation calculated Mr. Stephens' Offense Level as 34 with a Criminal History Category of III. USPO recommended a custodial sentence of 235 months followed by 5 years of supervised release.

Although Mr. Stephens appreciates the probation officer's recommendation of a guideline sentence, Mr. Stephens respectfully submits that such sentence is greater than necessary to comply with the goals of 18 U.S.C. § 3553(a)(2). Mr. Stephens respectfully contends that a sentence of 200 months of imprisonment is sufficient, but not greater than necessary to comply with that statute for the following reasons:

I. **ROBERT STEPHENS**

U.S. Probation did an excellent job of cataloging Mr. Stephens' criminal history. However, Robert Stephens is more than an offense level and a criminal history score.

The Presentence Investigation Report's Part C covers Robert's biographical information under the coldly bureaucratic title of "Offender Characteristics". After reading the information found in Part C, one could conclude that Mr. Stephens would end up in one of two places – an early grave or prison.

As the information in Part C. is of a sensitive nature, Defense Counsel will use oral argument to go into detail why this information is crucial to the Court when it imposes sentence.

II. **ROBERT STEPHENS WARRANTS A 200 MONTH SENTENCE**

Robert Stephens is going to prison for a very long time. Robert understands that his crime calls for a lengthy sentence, and he regrets his actions.

A 200-month prison sentence is a lengthy sentence. Such a term of imprisonment is a real punishment. It is lengthy and not a slap on the wrist.

Mr. Stephens will have 200 months behind prison walls to reflect upon his actions.

During this 200-month term of imprisonment, Robert can also get the care that he needs along with vocational training. Congress was correct when it included rehabilitation into the sentencing factors. One day in the future, Mr. Stephens will reenter society.

WHEREFORE, Mr. Stephens respectfully requests that the Court impose a custodial sentence of 200 months followed by 5 years of supervised release. Additionally, Mr. Stephens requests that he be given credit for all time served on these charges. Finally, Mr. Stephens requests that his custodial sentence include both drug and psychological counseling along with vocational training. Such a sentence would meet all the sentencing factors set forth in 18 U.S.C. § 3553(a).

Respectfully submitted this 2<sup>nd</sup> day of December, 2022.

/s/ Dennis A. O'Brien, Jr.  
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